

IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. THOMAS AND ST. JOHN

UNITED STATES OF AMERICA,

v.

SOMALIE BRUCE (1) and
JEANORAH WILLIAMS (2)

Defendants.

INDICTMENT

CRIMINAL NO. 21- 5

VIOLATIONS:

18 U.S.C. § 371, § 922(a)(1)(A), 922(k),
924(b), 924(a)(1)(B); 924(a)(1)(D), 2;
21 U.S.C. § 841(a)(1), 846;
14 V.I.C. § 2253(a), § 2256(a);
23 V.I.C. § 481(b)

THE GRAND JURY CHARGES THAT:

INTRODUCTION

At all times relevant to this Indictment:

1. SOMALIE BRUCE nor JEANORAH WILLIAMS was a licensed firearm dealer, importer, or manufacturer as defined by Title 18, United States Code, Section 921(a).
2. SOMALIE BRUCE and JEANORAH WILLIAMS did not possess a valid license to own or otherwise possess a firearm in the United States Virgin Islands.

COUNT ONE

(Conspiracy to Possess Cocaine with Intent to Distribute)

On beginning on or about a date unknown to and continuing to on or about March 17, 2020 at St. Croix, in the District of the Virgin Islands, and elsewhere, defendant,

SOMALIE BRUCE,

knowingly and intentionally combined, conspired, confederated, and agreed together with others known and unknown to the Grand Jury, to commit the following offense against the United States:

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to distribute 500 grams and more of a mixture and substance containing cocaine, a Schedule II controlled substance; all in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(B), and 846.

COUNT TWO

(Possession of Cocaine with Intent to Distribute)

On or about March 17, 2020 at St. Croix, in the District of the Virgin Islands, defendant,

SOMALIE BRUCE,

knowingly and intentionally distributed 500 grams and more, to wit: approximately one kilogram, of a mixture and substance containing a detectible amount of cocaine, a Schedule II controlled substance; all in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT THREE

(Conspiracy to Traffic Firearms)

From on or about January 1, 2016, and continuing thereafter until on or about December 8, 2020, at St. Croix, in the District of the Virgin Islands, and elsewhere, the defendants,

SOMALIE BRUCE and JEANORAH WILLIAMS,

together and with others known and unknown to the Grand Jury, did unlawfully, willfully, and knowingly combine, conspire, confederate and agree among themselves and each other to commit certain offenses against the United States as follows:

- (1) to ship, transport, and receive firearms in interstate and foreign commerce by persons who were not licensed to import, manufacture, or deal firearms; in violation of Title 18, United States Code, Section 922(a)(1)(A);
- (2) to ship, transport, and receive any firearm and ammunition in interstate and foreign commerce with knowledge and with intent to commit an offense punishable by

imprisonment for a term exceeding one year and with knowledge and reasonable cause to believe that an offense punishable by imprisonment for a term exceeding one year is to be committed; in violation of Title 18, United States Code, Section 924(b).

MANNER AND MEANS OF CONSPIRACY

- (A) It was a part of the conspiracy that defendants purchased firearm parts and accessories from various gun manufacturers in North Carolina and Florida, which were shipped via the U.S. Mail to St. Croix, USVI.
- (B) It was further part of the conspiracy that once the firearm parts arrived in the USVI, defendants manufactured and built operable firearms, and did not register said firearms with the Virgin Islands Police Department as required by law.
- (C) It was further part of the conspiracy that the firearms and ammunition were distributed to unknown persons in the Virgin Islands who did not comply with the Virgin Islands requirements to register the weapons with the Virgin Islands Police Department. Some of the firearms had an obliterated serial number or no serial number in an effort to thwart identification of said firearms.

OVERT ACTS

In furtherance of the conspiracy and to effect the objects of the conspiracy, the following overt acts, among others, were committed in the District of the Virgin Islands and elsewhere:

- (1) On or about and between May 7, 2019 through and including March 19, 2020, JEANORAH WILLIAMS purchased 48 separate money orders from the United States Post Office totaling \$47,818 and made payable to various firearm part companies including Aluminum Products in Florida; Elite Aluminum Products in Florida; FTF Industries in North Carolina; and Rockslide USA in North Carolina.
- (2) On or about and between March 2019 and December 2019, SOMALIE BRUCE

- purchased 19 separate money orders from the United States Post Office totaling \$18,287 and made payable to various firearm part companies including Aluminum Products in Florida; Elite Aluminum Products in Florida; Daytona Tactical in Florida; FTF Industries in North Carolina; and Rockslide USA in North Carolina.
- (3) On or about July 7, 2020, SOMALIE BRUCE placed an order to purchase over \$2,300.00 in firearm parts and accessories from FTF Industries.
- (4) On or about August 3, 2020, SOMALIE BRUCE retrieved a package addressed to him from the Frederiksted, St. Croix Post Office which contained firearm parts and accessories sent by FTF Industries in North Carolina as described in ¶(3).
- (5) On or about September 19, 2020, JEANORAH WILLIAMS placed an order to purchase over \$2,200.00 in firearm parts and accessories from FTF Industries.
- (6) On or about October 9, 2020, SOMALIE BRUCE retrieved a package addressed to him from the Frederiksted, St. Croix Post Office, which contained two Polymer80 lower receivers compatible for a Glock firearm, two Rock Slide USA with Glock barrels, one Glock magazine, and other firearm parts and accessories sent by Rock Slide USA in North Carolina.
- (7) On or about October 13, 2020, SOMALIE BRUCE retrieved a package addressed to JEANORAH WILLIAMS from the Christiansted, St. Croix Post Office which contained firearm parts and accessories sent by FTF Industries in North Carolina as described in ¶(5).
- (8) On or about December 8, 2020, SOMALIE BRUCE retrieved a package addressed to JEANORAH WILLIAMS from the Christiansted, St. Croix Post Office which contained firearm parts and accessories sent by Daytona Tactical in Florida.

COUNT FOUR

(Engaging in the Business without a Firearms License)

On or about and between January 1, 2018 and December 8, 2020, at St. Croix, in the District of the Virgin Islands, the defendants,

SOMALIE BRUCE and JEANORAH WILLIAMS,

not being a licensed dealer, importer, and manufacturer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in manufacturing firearms, in violation of Title 18, United States Code, Sections 922(a)(1)(A), 923(a), 924(a)(1)(D) and 2.

COUNT FIVE

(Possession of a firearm with an obliterated serial number)

On or about December 8, 2020, at St. Croix, in the District of the Virgin Islands, the defendant,

SOMALIE BRUCE,

did knowingly possess a firearm, as that term is defined in Title 18, United States Code, Section 921(a)(3), that is: a Glock, Model 22, which had been shipped and transported in interstate and foreign commerce, from which the manufacturer's serial number had been removed, altered and obliterated; all in violation of Title 18, United States Code, Sections 922(k) and 924(a)(1)(B).

COUNT SIX

(Ship, Transport or Receive Firearms with Intent to Commit an Offense)

Beginning or about January 1, 2018, and continuing to on or about December 8, 2020, at St. Croix, in the District of the Virgin Islands, the defendants,

SOMALIE BRUCE and JEANORAH WILLIAMS,

aided and abetted by each other, knowingly and with intent to commit an offense punishable by

imprisonment for a term exceeding one year and with reasonable cause to believe that an offense punishable by imprisonment for a term exceeding one year is to be committed, that is, Unauthorized Possession of a Firearm, in violation of Title 14, Virgin Islands Code, Sections 2253(a) and 11(a), did ship, transport, and receive firearms and ammunition in interstate and foreign commerce; all in violation of Title 18, United States Code, Sections 924(b) and 2.

COUNT SEVEN

(Unauthorized possession of a firearm)

On or about December 8, 2020, at St. Croix, in the District of the Virgin Islands, the defendants,

SOMALIE BRUCE and JEANORAH WILLIAMS,

did possess, bear, transport and carry, actually and constructively, openly and concealed any firearm, to wit: one Glock, model 22 (no serial number); five Polymer80 frames with attached slide (non-commercially constructed firearms); one lower AR receiver with full trigger assembly; three milled lower AR receivers; and one Mossberg 500A shotgun, Serial No. K189860; as defined by Title 23, Virgin Islands Code, Section 451(f), loaded or unloaded, while not being authorized to do so; all in violation of Title 14, Virgin Islands Code, Section 2253(a).

COUNT EIGHT

(Possession of Firearm with Obliterated Serial Number)

On or about December 8, 2020, at St. Croix, in the District of the Virgin Islands, the defendant,

SOMALIE BRUCE,

did possess, bear, transport and carry, actually and constructively, openly and concealed, any firearm, that is semi-automatic weapon, a Glock, Model 22, as defined by Title 23, Virgin

Islands Code, Section 451(f), loaded or unloaded, with an altered and obliterated serial number in a public place, residential area and any place where persons are gathered; all in violation of Title 23, Virgin Islands Code, Section 481(b).

COUNT NINE
(Unlawful possession of ammunition)

On or about December 8, 2020, at St. Croix, in the District of the Virgin Islands, the defendants,

SOMALIE BRUCE and JEANORAH WILLIAMS,

unlawfully possessed firearm ammunition, in violation of Title 14, Virgin Islands Code, Section 2256(a).

NOTICE OF FORFEITURE

18 U.S.C. § 924(d) - Firearms and Ammunition Forfeiture

1. The allegations contained in Counts Three through Six of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

2. Upon conviction of one or more of the offenses alleged in Counts 3-6 of this Indictment, the defendants,

SOMALIE BRUCE and JEANORAH WILLIAMS,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), all firearms and ammunition involved in the commission of the offenses, including, but not limited to the following:

- a. one Glock, model 22 (no serial number);

- b. one Mossberg 500A shotgun, Serial No. K189860;
- c. all accompanying ammunition confiscated with the above-referenced firearms and firearms parts;
- d. four Polymer80 frames with attached slides;
- e. one Polymer80 frame with attached slide;
- f. one lower AR receiver with full trigger assembly;
- g. three milled lower AR receivers;
- h. firearm manufacturing tools; and
- i. various firearm parts and accessories.

3. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

All pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c).

NOTICE OF FORFEITURE

21 U.S.C. § 881(a)(4) – Forfeiture of Vehicle Used to Facilitate Violation of Counts 1 and 2.

The allegations contained in Counts One and Two of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Sections 881(a)(4) and 853(g) and Title 28, United States Code, Section 2461(c).

2. Upon conviction of one or more of the offenses alleged in Counts 1 and 2 of this Indictment, the defendant,

SOMALIE BRUCE,

shall forfeit to the United States, pursuant to Title 21, United States Code, Sections 881(a)(4) and 853(g) and Title 28, United States Code, Section 2461(c), the following described property used by the defendant to transport, or in any manner to facilitate the transportation, sale, receipt, possession, or concealment of the controlled substance described in Counts 1 and 2, to wit:

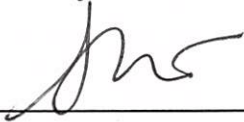
2011 Black Ford F-150 truck, VIN #1FTFW1ETXBFC12485;

3. If the property described above, as a result of any act or omission of the defendant:
- a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third party;
 - c. has been placed beyond the jurisdiction of the court;
 - d. has been substantially diminished in value; or
 - e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

All pursuant to 21 U.S.C. §§ 881(a)(4), 853(p) and 28 U.S.C. § 2461(c).

GRETCHEN C.F. SHAPPERT
United States Attorney



Alessandra P. Serano
Chief, Criminal Division
Assistant U.S. Attorney

DISTRICT COURT OF THE VIRGIN ISLANDS: Returned a TRUE BILL into the District Court
18th day of March 2021, by Grand Jurors and filed.



HONORABLE RUTH MILLER
United States Magistrate Judge
District of the Virgin Islands